

**JENNY L. FOLEY, Ph.D., ESQ.**

Nevada Bar No. 9017

E-mail: [jfoley@hkm.com](mailto:jfoley@hkm.com)

**MARTA D. KURSHUMOVA, ESQ.**

Nevada Bar No. 14728

E-mail: [mkurshumova@hkm.com](mailto:mkurshumova@hkm.com)

**DANA SNIEGOCKI, ESQ.**

Nevada Bar No. 11715

E-mail: [dsniegocki@hkm.com](mailto:dsniegocki@hkm.com)

**HKM EMPLOYMENT ATTORNEYS LLP**

1785 East Sahara, Suite 300

Las Vegas, Nevada 89104

Tel: (702) 805-8340

Fax: (702) 920-8112

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

STEPHEN SHRAMO, an Individual,

Plaintiff,

vs.

INTELLIGENT TECHNICAL  
SOLUTIONS, a Nevada corporation; DOES  
1-X; ROE CORPORATIONS I-X,

Defendants.

**CASE NO.: 2:20-cv-01148-APG-EJY**

**STIPULATION AND ORDER FOR  
SETTLEMENT CONFERENCE AND  
TO STAY DISCOVERY**

This parties, Plaintiff, STEPHEN SHRAMO (“Plaintiff”), and Defendant, INTELLIGENT TECHNICAL SOLUTIONS (“Defendant”), by and through their respective attorneys of record, hereby stipulate and agree as follows:

1. The parties have agreed that a settlement conference is likely to be successful in this matter and request that the Court order the parties to attend a settlement conference at a time convenient for the Court;

2. The parties also agree that expending monies on discovery pending the outcome of the settlement conference is likely to be detrimental to the settlement process in that

1 expending time and attorneys fees on discovery issues is likely to reduce the potentially  
2 available funds for settlement.

3 3. In the unlikely event the settlement conference is not successful, the parties will  
4 meet and confer pursuant to FRCP 26 and will submit a discovery plan and order within ten  
5 days of the settlement conference.  
6

7  
8 Dated: August 10, 2020

Dated: August 10, 2020.

9 HKM EMPLOYMENT ATTORNEYS LLP

SPENCER FANE LLP

10 By: /s/ Jenny L. Foley  
11 JENNY L. FOLEY, ESQ.  
Nevada Bar No. 009017  
12 MARTA D. KURSHUMOVA, ESQ.  
Nevada Bar No. 14728  
13 1785 East Sahara, Suite 300  
14 Las Vegas, Nevada 89104  
Telephone: (702) 805-8340  
15 Facsimile: (702) 920-8112  
Email: jfoley@hkm.com  
16 Email: mkurshumova@hkm.com  
17 Attorneys for Plaintiff

By: /s/ Linda K. Williams  
VINCENT J. AIELLO, ESQ.  
Nevada Bar No. 007970  
LINDA K. WILLIAMS, ESQ.  
Nevada Bar No. 012135  
300 South Fourth Street, Suite 950  
Las Vegas, NV 89101-6207  
Telephone: (702) 408-3400  
Facsimile: (702) 408-3401  
Email: vaiello@spencerfane.com  
Email: lwilliams@spencerfane.com  
Attorneys for Defendant

18  
19  
20 IT IS SO ORDERED. This case is  
21 referred to the Clerk of Court for  
22 assignment to the Early Neutral  
23 Evaluation Program.

24   
UNITED STATES MAGISTRATE JUDGE

25 Dated: August 11, 2020  
26  
27  
28